

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 19-</b>
<b>v.</b>	:	<b>DATE FILED: August 1, 2019</b>
<b>MELISSA MADERA</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 1591(a), (b)(1) (sex trafficking by force, fraud, or coercion – 1 count),</b>
	:	<b>18 U.S.C. § 1591(a), (b)(2) (sex trafficking of a minor - 1 count),</b>
	:	<b>18 U.S.C. § 2252(a)(2), (b)(1) (distribution of child pornography – 1 count</b>
	:	<b>18 U.S.C. § 2252(a)(2), (b)(1) (receipt of child pornography – 1 count)</b>
	:	<b>18 U.S.C. § 2252(a)(4)(B), (b)(2)</b>
	:	<b>(possession of child pornography – 1 count)</b>
	:	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From on or about September 14, 2017 to on or about October 19, 2017, in Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MELISSA MADERA**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported; provided and obtained, by any means, Minor #1, knowing, and in reckless disregard of the fact, that Minor #1 had not attained the age of 18 years, and knowing, and in reckless disregard of the fact, that force, fraud, or coercion would be used to cause Minor #1 to engage in a commercial sex act, and having had reasonable opportunity to observed Minor #1.

In violation of Title 18, United States Code, Section 1591(a), (b)(1).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

From in or about August 2017 to in or about October 2017, in Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MELISSA MADERA**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided and obtained by any means, Minor #2, knowing, and in reckless disregard of the fact, that Minor #2 had not attained the age of 18 years, and knowing that Minor #2 would be caused to engage in a commercial sex act, and having had reasonable opportunity to observe Minor #2.

In violation of Title 18, United States Code, Section 1591(a), (b)(2).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 5, 2017, in Berks County, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MELISSA MADERA**

knowingly distributed a visual depiction, depicting Minor #2, that had been mailed, shipped, and transported, in and affecting interstate and foreign commerce by any means, including by computer, and the producing of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Section 2252(a)(2), (b)(1).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 5, 2017, in Berks County, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MELISSA MADERA**

knowingly received a visual depiction, depicting Minor #2, that had been mailed, shipped, and transported, in and affecting interstate and foreign commerce by any means, including by computer, and the producing of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Section 2252(a)(2), (b)(1).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 5, 2017, in Berks County, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MELISSA MADERA**

knowingly possessed matter, that is, a computer/mobile device, which contained a visual depiction, depicting Minor #2, that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate or foreign commerce. The production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of a minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B), (b)(2).

**NOTICE OF FORFEITURE - ONE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Section 1591(a) set forth in this indictment, defendant

**MELISSA MADERA**

shall forfeit to the United States of America any property, real or personal, that was used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation of Title 18, United States Code, Section 1591(a), or any property, real or personal, constituting or derived from, any proceeds that were obtained, directly or indirectly, as a result of such violation, as charged in this indictment.

All pursuant to Title 18, United States Code, Section 1594(d) and (e).

**NOTICE OF FORFEITURE - TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Section 2252, set forth in this indictment, defendant

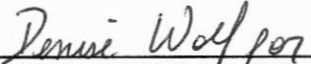
**MELISSA MADERA**

shall forfeit to the United States of America any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

All pursuant to Title 18, United States Code, Section 2253.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

  
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**WILLIAM M. McSWAIN**  
**UNITED STATES ATTORNEY**